

SPH Medical Staff Conflict of Interest Policy
January 24, 2008

- SPH's policy focuses on conflict of interest issues not economic credentialing
- Deals with board conflict of interest issues like any business
- Proactive approach by the board to get ahead of any future issues in Helena. Currently, there is no conflict issue in the community. Goal was to establish guidelines up front so every one knows the parameters.
- Policy was developed over a 6 month process after the law was passed. It is less restrictive than the law allows.
- Policy allows if have competing designated facility physician is still allowed to be on the medical staff and in committee chair positions. Also allows ancillaries in the individual clinics. Only restriction is the chief of staff position.
- Chief of Staff role is very important to the hospital and need to be in a clear position to advocate for the medical staff to the board without self economic interests and dealing with insider information.
- Worked collaboratively with the medical staff to discuss issues and even sought input from the Montana Medical Association Executive Committee which felt it was reasonable.
- Attached is a copy of the policy.

MEDICAL STAFF CONFLICT OF INTEREST POLICY

A. Policy:

It is the policy of St. Peter's Hospital that a Physician who has a Competing Relationship in a Designated Facility that provides similar services to those offered by the Hospital, has a potential conflict of interest with his/her membership on the medical staff of the Hospital such that his/her continued participation in the leadership affairs of the Hospital may be detrimental to the interests of the Hospital community at large. Therefore, no physician who has a Competing Relationship in a Designated Facility, as defined herein, may serve on the Board of Directors of the Hospital or as chief of the medical staff.

B. Definitions: For purposes of this policy, the following definitions apply:

“Competing Relationship” means the provision of health care services at, a compensation arrangement with, an ownership interest in, or occupation of a leadership position on the medical staff of a Designated Facility by a physician, or a partner or employee of the physician.

“Designated Facility” means all or a portion of a facility, private or public, located within a forty mile radius of the hospital campus, that is not owned in whole or in part by the Hospital, and that is an end-stage renal dialysis facility, home health agency, home infusion therapy agency, hospice, hospital, outpatient center for surgical services, rehabilitation facility, or a diagnostic facility, but does not include a physician office or ancillary services provided therein, a federal facility, a facility providing psychiatric services to children or adolescents, or a facility contractually approved by the Hospital.